

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	08CR888
	)	
ROD BLAGOJEVICH	)	Judge James B. Zagel
	)	

OBJECTIONS TO JURY INSTRUCTIONS

Now Comes Defendant Rod Blagojevich, by and through his attorneys, and hereby formally objects, pursuant to Federal Rule of Criminal Procedure 30, to the instructions given to the jury in this case. In support thereof, Defendant states the following:

As stated in open court, defendant Rod Blagojevich objects to the jury instructions pursuant to Fed. Rule Crim. Pro. 30. This motion renews the objection made prior to the jury instructions being given to the jury and also objects after the instructions were given to the jury.

Defendant hereby incorporates the objections made at the jury instructions conferences, in other filings and at other appearances before the court regarding jury instructions. Defendant objects to the giving of instructions offered by the government to which the defense objected. Defendant also objects to the refusal of defendant's offered instructions.

The government's instructions, of which a significant number were non-pattern, were one-sided statements of the law that are misleading for the jury. The defense objects to each of these instructions and the instructions are being given to the jury over objection. In some instances, additional language was added to instructions which catered to the facts of the government's theory of this case in an improper manner (e.g., the "good faith" instructions). Defense counsel objects to the rulings and the overall prejudicial pattern of rulings by the court. The rulings render the jury instructions as a whole objectionable and improperly misleading.

Additionally, for reasons previously stated, the defense renews its objections regarding the jury instructions related to honest services, wire fraud, scheme to defraud, intent to defraud and every instruction related to these counts (1-10).

Defendant incorporates by reference the prior arguments and objections regarding jury instructions.

WHEREFORE, Defendant Rod Blagojevich objects to the jury instructions.

Respectfully Submitted,  
/s/ Lauren Kaeseberg  
One of the Attorneys for  
Rod Blagojevich

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